

**UNITED STATES DISTRICT COURT  
IN THE DISTRICT OF MINNESOTA**

---

Annette Williams,

Court File No. 19-cv-01536 PJS/SER

Plaintiff,

v.

**STIPULATION OF DISMISSAL  
WITH PREJUDICE**

Unlimited Progress Corp. d/b/a  
Creditors Discount and Audit,  
Trans Union LLC,

Defendants.

---

**IT IS HEREBY STIPULATED AND AGREED** by and between Plaintiff Annette Williams and Defendant Unlimited Progress Corp. d/b/a Creditors Discount and Audit (“Unlimited”), by their respective undersigned attorneys, that the above-entitled action by Plaintiff may be, and hereby is, dismissed on its merits with prejudice, without costs or disbursements to any party. The parties agree that the Court may enter its Order for Dismissal With Prejudice pursuant to this Stipulation without further appearance by any party.

Dated: July 23, 2019

By s/ David J.S. Madgett

David J.S. Madgett (#0390494)  
619 South Tenth Street, Suite 301  
Minneapolis, MN 55404  
(612) 470-6529  
[dmadgett@madgettlaw.com](mailto:dmadgett@madgettlaw.com)

*Attorney for Plaintiff*

**BASSFORD REMELE**  
***A Professional Association***

Dated: July 23, 2019

By s/ Jessica L. Klander

Michael A. Klutho (MN #186302)

Jessica L. Klander (MN #392290)

Attorneys for Unlimited Progress Corp. d/b/a

Creditors Discount & Audit Co.

100 South 5th Street, Suite 1500

Minneapolis, MN 55402-1254

Telephone: (612) 333-3000

Facsimile: (612) 333-8829

[mklutho@bassford.com](mailto:mklutho@bassford.com)

[jklander@bassford.com](mailto:jklander@bassford.com)